



Civil Rights Division

SHR:LLC:RJG:JDH
DJ 207-61-1

*Special Litigation Section - PHB
950 Pennsylvania Ave, NW
Washington DC 20530*

April 2, 2021
Via mail and email

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ADMISSIBILITY SUBJECT TO FED. R. EVID. 408

RE: *United States v. City of Portland*, 3:12-cv-02265-SI
Notice pursuant to Amended Settlement Paragraph 178

Dear Mr. Taylor and Chief Lovell:

We write pursuant to Paragraph 178 of the Amended Settlement Agreement in the above-referenced case to provide notice that the United States “reasonably believes the City has failed to implement the terms of the Agreement.” ECF 171. By this notice we aim to provide structure to the process by which the City returns to and maintains substantial compliance with the Agreement.

Our concerns are laid out with specificity in the Fifth Periodic Compliance Assessment Report that we filed on February 10, 2021. ECF 236. Our Report found that the City has failed to implement the following terms of the Agreement: Section III – Use of Force, Paragraphs 66, 67, 69, 70, and 73; Section IV – Training, Paragraphs 78 and 84; Section VIII – Officer Accountability, Paragraphs 121, 123, and 169; and Section IX – Community Engagement and Creation of Portland Committee on Community Engaged Policing, Paragraph 150. Further, our March 23, 2021 letter containing the requested Police Review Board written critique expands on our assessment of the City’s failure to fully implement the terms of Paragraphs 66, 67, 69, 70, 73, and 169. This notice incorporates by reference the sections of our compliance assessment report cited above and the March 23 letter.

We look forward to receiving the City's written response in the next 30 days.

Sincerely,

/s/ Jonas Geissler

/s/ Jared D. Hager

R. Jonas Geissler
Senior Trial Attorney
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Jared D. Hager
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